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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DARYELLE LAWANNA PRESTON,

Plaintiff,

v.

CITY OF OAKLAND,

Defendant.

Case No. 14-cv-02022 NC

VERDICT FORM

1 The jury must unanimously agree on the answer for each of the following questions;
2 please put an "X" next to the jury's unanimous answer for each question:

3 California Labor Code

- 4 1. Did Preston prove by a preponderance of the evidence that she disclosed
5 and/or refused to participate in an act that she reasonably believed violated a
6 state or federal law?

7 Yes X No _____

8 If you answered "Yes" to question 1, then answer question 2.

9 If you answered "No" to question 1, please skip to bottom, answer no further
10 questions, and have the presiding juror sign and date this form.

- 11 2. Did Preston prove by a preponderance of the evidence that her disclosure of
12 information and/or refusal to participate in these activities was a contributing
13 factor in the City of Oakland's decision to discharge Preston?

14 Yes X No _____

15 If you answered "Yes" to question 2, then answer question 3.

16 If you answered "No" to question 2, please skip to bottom, answer no further
17 questions, and have the presiding juror sign and date this form.

- 18 3. Did Preston prove by a preponderance of the evidence that she was harmed?

19 Yes X No _____

20 If you answered "Yes" to question 3, then answer question 4.

21 If you answered "No" to question 3, please skip to bottom, answer no further
22 questions, and have the presiding juror sign and date this form.

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28 Continued on page 3

4. Did Preston prove by a preponderance of the evidence that Santana's conduct, acting on behalf of the City of Oakland, was a substantial factor in causing Preston's harm?

Yes ☒ No ☐

If you answered "Yes" to question 4, then answer question 5.

If you answered "No" to question 4, please skip to bottom, answer no further questions, and have the presiding juror sign and date this form.

5. Did the City of Oakland prove by clear and convincing evidence that it would have discharged Preston, for legitimate, independent reasons, absent her disclosure and/or refusal to participate in an act she reasonably believed violated state or federal law?

Yes ☐ No ☒

If you answered "Yes" to question 5, please skip to bottom, answer no further questions, and have the presiding juror sign and date this form.

If you answered "No" to question 5, then answer question 6.

6. What are Preston's damages against the City of Oakland?

a. Past lost earnings \$ 92,050

b. Future lost earnings \$ 82,000

c. Future pension plan benefits \$ 409,829

d. Emotional distress damages \$ 29,423

TOTAL: \$ 613,302

Signed: 
Presiding Juror

Dated: 23 Sept 2015

After this verdict form has been signed, notify the courtroom deputy that you are ready to present your verdict in the courtroom.